

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a nominal defendant; ISIAAH KEE; MICHAEL BLACKWOOD; BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

**PLAINTIFFS' REPLY IN SUPPORT
OF EX PARTE APPLICATION FOR
APPROVAL OF COMPROMISE OF
THE MINOR PLAINTIFFS AND
NOMINAL DEFENDANTS' CLAIMS**

1 Plaintiffs and State Defendants have resolved the issues regarding the language
2 on the Qualified Assignment and Release for the minors. Plaintiffs and State
3 Defendants have also come to an agreement regarding additional “slide language” to
4 the proposed order and additional paperwork to account for the potential possibility
5 that CHP may not be able to fund the annuities within the required time, and thus
6 having to avoid having to go back to the Court to request for an amended order to
7 reflect different payout dates or amounts based on potentially different annuities.

8 Plaintiffs and Nominal Defendant will be filing an Amended Ex Parte
9 Application for Approval of the Minor Plaintiffs and Nominal Defendants’ Claims
10 with the additional agreed-upon “slide language” inserted into the proposed order and
11 annuity attachments as well as correcting mistakes that were identified by State
12 Defendants in Plaintiffs’ counsel’s declaration and the proposed order.

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14 Respectfully submitted,

15 DATED: August 11, 2025

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17 By /s/ Hang D. Le
18 Dale K. Galipo
19 Hang D. Le
20 Attorneys for Plaintiffs
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